

**REMARKS**

By the present amendment and response, claim 1 has been amended to correct an antecedent basis. Claims 1-35 remain pending in the present application. Applicant respectfully requests reconsideration and allowance of pending claims 1-35 in view of the following remarks.

**A. Rejection of Claims 1, 5, 6, 10, 17, 23, 24, 28, 29, 33 and 34 Under 35 USC §103**

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The Examiner has rejected claims 1, 5, 6, 10, 17, 23, 24, 28, 29, 33 and 34 under 35 USC §103(a) as being unpatentable over Hollander (US 6,182,258) in view of Chan (US 6,466,898).

Applicant respectfully disagrees and submits that independent claims 1, 10, 17, 23 and 33 are patentably distinguishable over the cited art, separately or in combination.

Applicant notes that the Examiner has acknowledged that “*Hollander* reference does not expressly disclose *at least one of said function calls comprises a cycle-based function corresponding to a collection of communications events*”. [Emphasis Original]. Subsequently, the Examiner made an impermissible leap by suggesting that “*Hollander* discloses that there is a need in the art for the reduction of verification time (**Hollander Col. 2 Lines 8-9**).” [Emphasis Original]. Thus, the Examiner argues that there is a motivation to search the system and find the Chan reference, which was not even

available to the general public at the time the invention was made, to combine with Hollander. 35 U.S.C. §102(e).

One issue with the Examiner's arguments is the misreading of Hollander. In Col. 2 Lines 8-9 of Hollander, as cited by the Examiner, Hollander states that "the prior art have not adequately addressed the **reduction of verification *development* time.**" [Emphasis Added]. Note that Hollander is interested in reducing "verification development time" and not "verification time" as suggested by the Examiner.

One fundamental difference between "verification development time" and "verification time" is that the former involves time for developing test procedures required to verify a system, while the latter involves the actual execution time of the developed test procedures. This distinction is further supported by reading Column 2, lines 13-22 of Hollander where it explains that "verification development" involves construction of testing tools (i.e. "verification procedures"). Thus, contrary to the Examiner's assertions, Hollander does not suggest a need for "reduction of verification time" but a need for a reduction of time required to develop test procedures.

Applicant respectfully requests that the Examiner withdraw the present rejection or provide evidence of motivation, from the references, to combine the Hollander and Chan references. See MPEP §2143 ("The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. In re Mills, 916 F.2d 680, 16 USPQ2d 1430

(Fed. Cir. 1990)"). Without such evidence of motivation to combine, the present 35 U.S.C. §103 rejection cannot stand.

Moreover, Chan does not teach the claim element suggested by the Examiner. In the passage cited by the Examiner, Chan teaches support for two HDL "languages in a single program to perform both event-driven and cycle-based logic simulation on a multiprocessor platform". This cited passage by itself does not equate to the claim element "creating a set of function calls in a high level general purpose programming language, wherein at least one of said function calls comprises a cycle-based function corresponding to a collection of communication events".

Because both Chan and the present invention use the phrase "cycle-based" does not mean that Chan automatically teaches the claim element. Chan teaches **support** for merely two high level programming languages in a multi-processor environment. It does not teach "**creating** a set of function calls in a high level general purpose programming language".

Hollander on the other hand is not concerned with multi-processor systems. Hollander is concerned with test generation for integrated circuits. Thus, a combination of Hollander and Chan cannot result in the present invention. The proposed combination would likely result in development of tests to run in a multiprocessor platform. Thus, there would be no motivation to combine Chan with Hollander since the combination does not teach, suggest, or anticipate the present invention.

**B. Rejection of Claims 2-9, 11-16, 18-22, 24-32, and 34-35**

Applicant submits that dependent claims 2-9, 11-16, 18-22, 24-32, and 34-35, being dependent upon allowable base claims, are allowable for the foregoing reasons.

**C. Conclusion**

For all the foregoing reasons, Applicant respectfully requests withdrawal of the final rejection and issuance of a timely Notice of Allowance in the present application.

Respectfully Submitted;  
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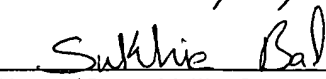
  
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